UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-10229-MLW
	)	
CARLI HOLLAND	)	
	)	

JOINT STATUS MEMORANDUM OF PARTIES

The United States of America, by Assistant U.S. Attorney James F. Lang, and the defendant Carli Holland, by counsel Walter Underhill, Esq., submit this joint memorandum pursuant to the Court's order of June 12, 2006.

The parties advise that since the last status report, Assistant United States Attorney ("AUSA") John Wortmann, on behalf of the United States, has engaged in continuing plea discussions with defense counsel, Attorney Underhill. Those discussions have been hampered of late by the vacation schedules of counsel, in that AUSA Wortmann was on vacation from June 7, 2006 until June 19, 2006 and Attorney Underhill is presently on vacation and will remain so until the third week of July, 2006. Nevertheless, it is the judgment of the parties at this juncture that the case is likely to be resolved by a guilty plea without the necessity of a trial.

Some additional time after Attorney Underhill returns from his vacation will be necessary to complete the plea

negotiations.[1] Accordingly, the parties request until August 14,

2006 to submit another status report, and they agree to the

exclusion of the time from today until August 14, 2006 from

computation of the time within which the case must be tried under

the Speedy Trial Act. If the parties are unable to conclude the

plea negotiations by that time and report to the Court that they

are prepared for the scheduling of a change of plea hearing, they

expect that the Court will set a date for trial.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/James Lang
James Lang
Assistant U.S. Attorney

CARLI HOLLAND
Defendant

By: /s/ Walter Underhill
Walter Underhill, Esq.
Counsel for Carli Holland

DATE: June 19, 2006

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[1]It is expected that AUSA James Lang will represent the
United States in the further plea negotiations that are
anticipated, and he will file an appearance in the case on this
date.